

REFERENCE: [Docket No. 00N-1246]
Comment Request; Food Safety Survey
Food and Drug Administration, HHS

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May 28, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

Dear FDA:

Recently the National Center on Public Policy released a survey, attached, noting that nearly 7 out of every 10 Americans are misled by certain food labels and branding that incorrectly implies food safety or nutrition benefits. Consumers – women in particular – incorrectly believe the foods labeled “organic” are safer or more nutritious than other foods. **This would indicate that the FDA proposed research is urgently needed and necessary.**

As foods marketed as “organic” tend to be premium-priced products, families may be spending more of limited food and health care dollars on these purchases. This would leave less money to help families meet their real nutrition and health care needs. Women are the principal food purchaser in most homes, and the principal source for health care information and purchases for their families. It is very important to understand **why** those people making such decisions are doing so with misinformation.

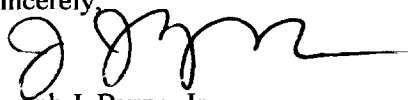
In addition, “organic” foods have been demonstrated to carry higher risks for certain types of bacterial contamination. This is should be of particular concern to people caring for infants, the elderly and those suffering from auto-immune disorders for whom such contamination can be deadly. Yet, recent reports indicate that there has been 110 percent annual growth in the “organic” baby food market, and that organic retailers are increasingly targeting new parents, the elderly and people suffering from chronic illnesses with their advertising and promotions.

To enhance the usefulness of data collected, it will be VERY important in addressing the sources of these misperceptions to better understand the sources from which this information is being delivered to consumers. **PLEASE include in your research ways of determining if there are MISLEADING marketing practices of “organic” or “natural” product retailers that impact consumer understanding of food safety. Please identify other sources of MISLEADING information, such as media reports and activist group activities, which may be contributing to this situation.**

Good health and safe food practices start with education and understanding. Please use the resources of this program to address the growing concern of consumer misinformation regarding organic foods and potential misleading disparagement of safe and affordable foods.

Thank you.

Sincerely,


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00N-1246

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National Survey: USDA Organic Food Labels Are Misleading

Updated 10:28 AM ET May 24, 2000

WASHINGTON (BUSINESS WIRE) - A new poll finds the U.S. Department of Agriculture's (USDA) proposed rules for labeling organic food products will seriously mislead consumers into thinking the products are safer, better in quality or more nutritious.

The survey, conducted by International Communications Research of Media, PA on behalf of the National Center for Public Policy Research, found two-thirds of the public would be misled by the proposed USDA seal on several key issues:

- 68 percent said they would interpret a product labeled "USDA Certified Organic" to be safer to eat than non-organic foods;
- 67 percent believed "USDA Certified Organic" to be better than non-organic foods; and,
- 62 percent believe "USDA Certified Organic" to be healthier for consumers than non-organic foods.

"Neither organic nor conventional producers are served by misleading the public over such important issues of food safety and nutrition," said John Carlisle, director of the Environmental Policy Task Force at the National Center for Public Policy Research. "A level playing field for organic growers can only exist if consumers are informed about the real benefits and risks of purchasing organically certified products."

According to both the USDA and the leadership of the \$6 billion organic industry, organic certification is only an accreditation of production methods used by farmers and not an assurance of food safety, quality, nutrition or health. USDA Secretary Dan Glickman, in announcing the proposed rules, stated that the USDA organic certification does not mean food labeled organic is "superior, safer or more healthy than conventional food." In a recent interview on ABC News' 20/20, Organic Trade Association director Katherine DiMatteo reiterated that organic products are not safer or more nutritious than other foods, noting, "Organic agriculture is not particularly a food safety claim. That's not what our standards are about."

The proposed USDA rules, developed in response to the Organic Food Production Act of 1990, are to help consumers distinguish products grown using national standards for organic production methods. Today, no national standards exist, and, according to the Organic Trade Association, as much as 50 percent of all foods sold as organic lack any certification on which consumers can rely to inform their purchase choice.

In other findings, this national consumer poll found seven out of ten (69 percent) said the USDA label would imply these products are better for the environment and four out of

ten (43 percent) believe these would be more nutritious. In fact, the label provided no information on either of these qualities.

"Consumers pay significant premiums, sometimes as much as 200 percent, for these products based on misperceptions that will be heightened by this USDA proposed label," noted Carlisle. "Clearly, consumers want the USDA to amend this rule to include specific language on the USDA proposed seal to inform consumers that organic certification is based on production methods and conveys no assurance of food safety, nutrition or other quality."

The Environmental Policy Task Force is a project of The National Center for Public Policy Research, a non-partisan, non-profit education foundation. To obtain a copy of the poll or to interview scientific experts, contact John Carlisle at The National Center for Public Policy Research at 202-371-1400, ext. 107.

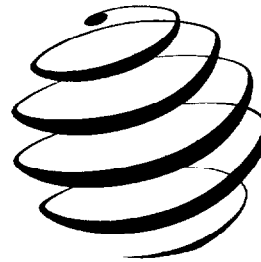
Contact: John Carlisle of the National Center for Public Policy Research, 202-371-1400, ext. 107; Web site: www.NationalCenter.org

ORGANIC LABELING STUDY

Presented to:
The National Center for Public Policy Research
Washington, DC

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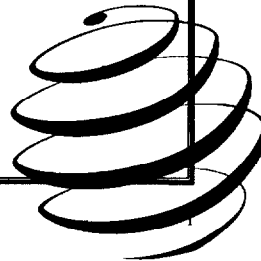
MAY 2000



METHODOLOGY

The study was conducted via telephone omnibus on May 12 through May 16, 2000 by ICR. A total of 1,029 adults across the United States were surveyed; 508 males and 521 females. The results were weighted to reflect the US population.

The sample for the omnibus was a list of randomly generated telephone numbers, drawn proportionate to the US population. In addition, adults age 18+ in the household were selected using the "last birthday method" to reduce bias.



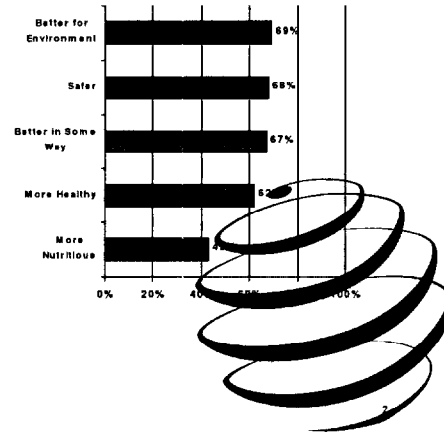
KEY FINDINGS

Consumers were told that the USDA has proposed new federal standards for organic foods which are the most comprehensive and strongest in the world. Products that meet the standards would be allowed to use a seal saying "USDA Certified Organic" and to use "organic" on packaging. Products that do not meet the standards could not use the seal.

Knowing this, consumers were asked to indicate whether the seal would mean the foods that bear it would be better in some way; safer; better for the environment; more healthy, or more nutritious than foods without the seal, or if the seal would not mean those things.

Consumers clearly feel the seal indicates a positive difference in foods with versus without the seal; in effect, that products with the seal would be better. A large majority feel the seal would mean the foods are better in some way; safer; more healthy; and better for the environment. The only area the seal would not indicate a difference for most people is "more nutritious."

USDA Seal Would Mean...
Base = Total



KEY FINDINGS (Continued)

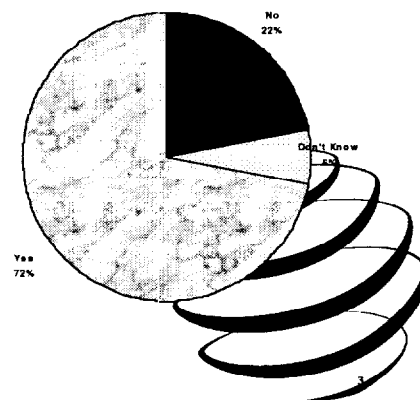
Since most consumers feel the organic seal would indicate the food was better, it is not surprising that they therefore also feel that if the USDA does not want consumers to think products with the seal means "better," then information saying so should be put on the seal. The majority (72%) want this type of information.

Women, who tend to be the primary grocery shoppers, are especially likely to want information on the seal saying so.

	Women	Men
Yes, seal should have information	76	67

Question: "If the USDA does not want consumers to think that foods that have the USDA Certified Organic seal are of better quality, safer, healthier or better for the environment than foods that are grown conventionally, should the USDA inform consumers by putting additional information on the seal or not?"

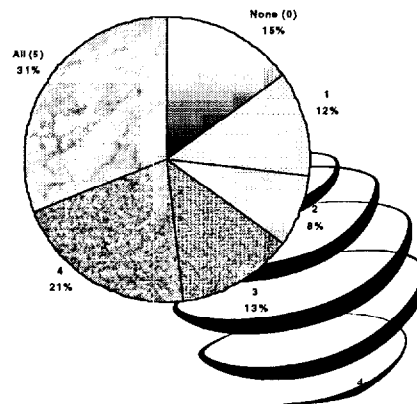
Should USDA Seal Inform Consumers
Seal Does Not Mean Better
Base = Total



NUMBER OF ATTRIBUTES USDA ORGANIC SEAL INDICATES BETTER

The vast majority (85%) feel that the USDA Certified Organic seal would mean that foods with the label excelled in at least one of the 5 attributes tested (better in some way; safer; more healthy; better for the environment; and more nutritious). In fact, one-third (31%) feel the organic seal would mean *all* of the attributes, and over-half (52%) feel the seal would mean at least four of the attributes.

Number of Attributes = YES
Base = Total



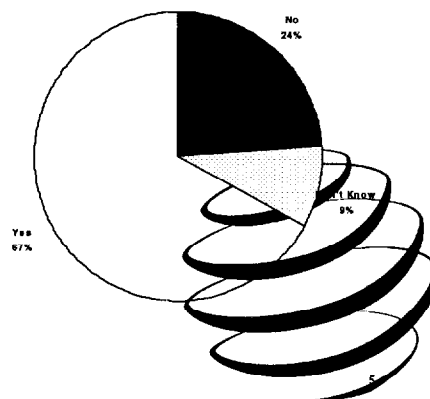
"BETTER IN SOME WAY" RESULTS

A large majority of consumers (67%) feel that foods with the USDA organic seal would mean that they are better in some way. Women are significantly more likely to feel that way.

	Women	Men
Yes, foods with seal are better	71	63

Question: "Do you think that foods that have the seal or label that says USDA Certified Organic would be in some way better than similar foods that don't have the seal and that may have been grown using chemical pesticides or other processes that do not meet organic standards, or would they not be better?"

Are Foods with a USDA Certified Organic Seal "Better in Some Way" or Not?
Base = Total

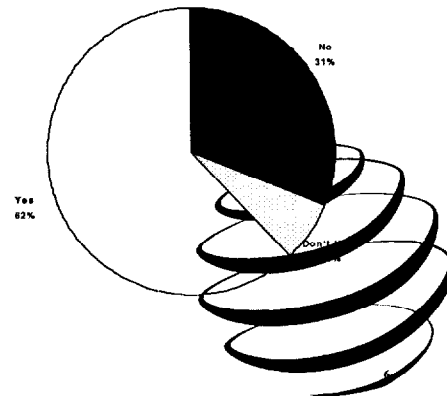


"MORE HEALTHY" RESULTS

A large majority of consumers (62%) feel that foods with the USDA organic seal would mean that they are more healthy than foods without the seal.

Question: "Would this USDA Certified Organic seal mean to you that foods that have the seal would generally be more healthy for consumers than similar foods that do not have this seal, or would it not mean this to you?"

Are Foods with a USDA Certified Organic Seal "More Healthy" or Not?
Base = Total

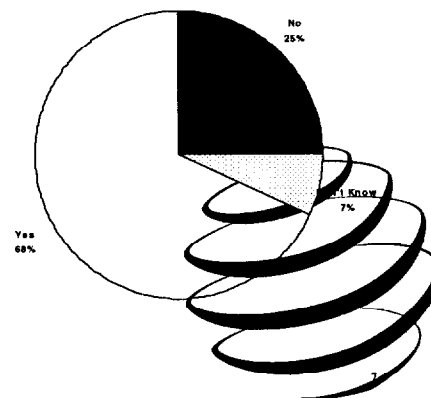


"SAFER" RESULTS

Again, a large majority of consumers (68%) feel that foods with the USDA organic seal would mean that they are safer than foods without the seal.

Question: "Would this USDA Certified Organic seal mean to you that foods that have the seal would be safer for consumers than similar foods that do not have this seal, or would it not mean this?"

Are Foods with a USDA Certified Organic Seal "Safer" or Not?
Base = Total

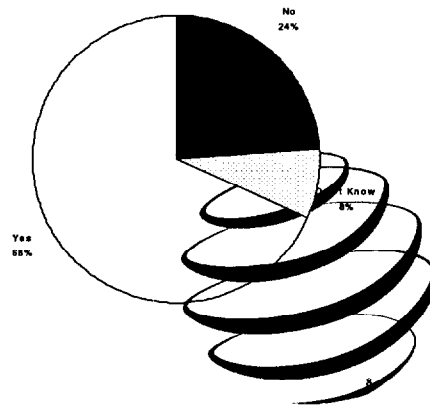


"BETTER FOR THE ENVIRONMENT" RESULTS

• A large majority of consumers (69%) also feel that foods with the USDA organic seal would mean that they are better for the environment than foods without the seal.

• Question: "Would this USDA Certified Organic seal mean to you that foods that have the seal were grown in such a way that was better for the environment than similar foods that do not have this seal, or would it not mean this to you?"

Are Foods with a USDA Certified Organic Seal "Better for the Environment" or Not?
Base = Total



"MORE NUTRITIOUS" RESULTS

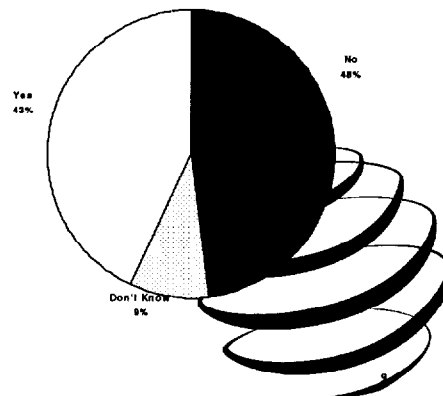
• A majority of consumers do not feel, however, that foods with the USDA organic seal would mean that they are more nutritious than foods without the seal. They are equally split on this issue; almost half say the seal would indicate the food is more nutritious and almost half say it would not.

• African-Americans are significantly more likely than whites to say that foods with the seal are more nutritious; in fact, over half feel that way.

	Blacks	Whites
Yes, foods are more nutritious	59	41

• Question: "Would this USDA Certified Organic seal mean to you that foods that have the seal would be more nutritious than similar foods that do not have this seal, or would it not mean this to you?"

Are Foods with a USDA Certified Organic Seal "More Nutritious" or Not?
Base = Total



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